

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	Case No. 4:13-CR-00301-CEJ-SPM
	)	
v.	)	
	)	
	)	
RICHARD SADDLER,	)	
	)	
Defendant.	)	

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL FOR DEFENDANT**

COME NOW Albert S. Watkins, Anthony S. Bretz, Michael D. Schwade, and the law firm of Kodner Watkins & Kloecker, LC, and request leave of Court to withdraw as counsel of record for the Defendant in the above-styled cause, and states to the Court as follows:

1. Counsel, Albert S. Watkins and Anthony S. Bretz entered separate Entries of Appearance on behalf of the Defendant, Richard Saddler, in connection with the present cause on July 22, 2013.
2. Counsel, Michael D. Schwade entered an appearance on behalf of the Defendant, Richard Saddler, on July 23, 2013.
3. Actions and developments have arisen which give rise to the requirement that counsel Watkins, Schwade and Bretz withdraw as counsel for the Defendant in the present case.
4. The actions of the Defendant giving rise to the need for counsel to withdraw give rise to compelling circumstances.
5. The present Motion to Withdraw has been made only after careful consideration

and endeavoring to minimize any possible adverse effect on the rights of the Defendant herein and the possibility of prejudice to the Defendant herein as a result of the withdrawal.

6. The situation giving rise to the need to withdrawal are such that, ethically, the legal counsel are not in a position to move forward as counsel for the Defendant without said representation inuring to the detriment of the Defendant.

7. The Defendant has been provided due notice of the need for said counsel to withdraw, allowing time for employment by the Defendant of replacement counsel.

8. All papers and property of the Defendant have been returned to the Defendant.

9. The Defendant is in possession of all discovery provided to date to said counsel as part of discovery herein.

10. The Defendant has been advised of all salient dates and deadlines relative to the present cause.

11. The actions giving rise to the need for withdrawal by said counsel are such that the withdrawal is mandatory.

12. Absent the granting of leave for said counsel to withdraw, said counsel would be forced to proceed with representation devoid of the inherent power to conduct themselves so as to promote the effective disposition of the present case on behalf of the Defendant, and the rights of the Defendant herein would not be judicially protected.

13. The present cause of action is in its early stages and the granting of the present Motion would not result in any prejudice inuring to the detriment of either the Defendant or the Government herein.

14. Continued representation of the Defendant herein by moving counsel would effectively require moving counsel to behave in a manner contrary to ethical standards. The rights of the Defendant herein are furthered by the granting of the present Motion.

15. The present Motion is brought in good faith with the highest degree of respect for the interests of the Defendant, the Government, and the Court. The present cause is not

currently set for trial and in its earliest stages.

WHEREFORE, counsel respectfully requests this Honorable Court grant leave to Albert S. Watkins, Anthony S. Bretz, Michael D. Schwade, and the law firm of Kodner Watkins & Kloecker, LC to withdraw from further representation of the Defendant, Richard Saddler, in the present cause of action, and for such other and further relief as the Court deems appropriate in the circumstances.

KODNER WATKINS & KLOECKER, L.C.

By: /s/ Albert S. Watkins  
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**CERTIFICATE OF SERVICE**

Signature above is also certification that on August 16, 2013, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court utilizing the DM/ECF system which will send notification of such filing to all parties of record, and via electronic mail and regular U.S. mail to Defendant, Richard Saddler

**VIA E-MAIL** [richardsaddler@yahoo.com](mailto:richardsaddler@yahoo.com)

**VIA REGULAR U.S. MAIL**

Mr. Richard Saddler  
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